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PARAMOUNT PICTURES CORPORATION

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

BARRY TUBB, an individual,  
  
Plaintiff,  
  
vs.  
  
PARAMOUNT PICTURES  
CORPORATION, a Delaware  
corporation,  
  
Defendant.

Case No. **2:24-cv-01417-GW-BFMx**

**STIPULATED REQUEST TO  
DISMISS ENTIRE ACTION WITH  
PREJUDICE AND ENTER  
JUDGMENT IN FAVOR OF  
DEFENDANT**

[[Proposed] Judgment Concurrently  
Submitted]

Action Filed: February 21, 2024

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1 IT IS HEREBY STIPULATED by and between the Parties, through their  
2 counsel, subject to this Court's approval, as follows:

3 1. On June 2, 2025, this Court entered an Order (Dkt. No. 78), which  
4 incorporated and made final its prior tentative rulings of June 28, 2024, and January  
5 29, 2025 (Dkt. Nos. 44, 72) (collectively, "Final Order"), and which granted with  
6 prejudice Defendant's Motion To Dismiss Plaintiff's federal claims under Federal  
7 Rule of Civil Procedure 12(b)(6), and granted with prejudice Defendant's Special  
8 Motion To Strike Plaintiff's state law claims under California Code of Civil  
9 Procedure § 425.16 ("SLAPP Motion").

10 2. The Parties agree that this Court's Final Order disposes of all  
11 Plaintiff's claims in this action, which therefore should be dismissed with prejudice.

12 3. On June 12, 2025, this Court entered an Order pursuant to a stipulation  
13 of the parties setting July 16, 2025, as the deadline for Plaintiff to file an appeal  
14 from the June 2, 2025 Order, and for Defendant to file a motion or application  
15 seeking recovery of fees and costs.

16 4. The Parties subsequently have agreed to a resolution in which Plaintiff  
17 will forgo any appeal, and Defendant will forgo recovery of attorneys' fees and  
18 costs, with no payments in any amount being made by either Party. As part of that  
19 resolution, set forth in a written settlement agreement, the Parties have agreed to the  
20 dismissal with prejudice of this action, and a stipulated judgment in favor of  
21 Defendant Paramount Pictures Corporation, with both Parties to bear their own fees  
22 and costs, subject to the Court's approval.

23 WHEREFORE, the parties respectfully submit this Stipulation and  
24 [Proposed] Order to the Court for its approval.

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1 DATED: June 20, 2025

DAVIS WRIGHT TREMAINE LLP  
KELLI L. SAGER  
DAN LAIDMAN  
SAM F. CATE-GUMPERT

By: /s/ Kelli L Sager  
Kelli L. Sager\*

Attorneys for Defendant  
PARAMOUNT PICTURES  
CORPORATION

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7 \*Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on  
8 whose behalf the filing is submitted, concur in the filing's content and have  
9 authorized the filing.

10 DATED: June 20, 2025

THE CASAS FIRM, P.C.  
JOSEPH N. CASAS  
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By: /s/ Dennis Postiglione  
Dennis Postiglione

Attorneys for Plaintiff  
BARRY TUBB